

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BANK JULIUS BAER & CO. LTD,

Defendant.

Adv. Pro. No. 11-02922 (SMB)

STIPULATION EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Bank Julius Baer & Co. Ltd. (“Defendant”) may move, answer, or otherwise respond to the Trustee’s complaint (the “Complaint”) filed in the above-captioned adversary proceeding (Adv. Pro. No. 11-02922 (SMB)) is extended up to and including November 21, 2014. The pre-trial conference will remain on January 28, 2015, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for the Defendant to move, answer, or otherwise respond to the Complaint. Nothing in this

Stipulation is a waiver of the Defendant's right to request from the Court a further extension of time to move, answer, or otherwise respond to the Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

[Remainder of page intentionally left blank.]

Dated: October 16, 2014
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Thomas L. Long
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Mark Kornfeld
Email: mkornfeld@bakerlaw.com
Thomas L. Long
Email: tlong@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC*

MCKOOL SMITH

By: /s/ Virginia I. Weber
One Bryant Park, 47th Floor
New York, New York 10036
Telephone: 212.402.9400
Facsimile: 212.402.9444
John P. Cooney, Jr.
Email: jcooney@mckoolsmith.com
Eric B. Halper
Email: ehalper@mckoolsmith.com
Virginia I. Weber
Email: vweber@mckoolsmith.com
Sachin S. Bansal
Email: sbansal@mckoolsmith.com

*Attorneys For Defendant Bank Julius Baer &
Co. Ltd.*